



Sara Boyd, Ph.D. Licensed Clinical Psychologist

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January 12, 2021

Kevin Mills & Shawn McDermott, Esq.
Mills McDermott PLLC
1800 West King Street
Martinsburg, West Virginia 25401

Re: *United States of America v. Timothy John Watson*
Criminal no. 3:20-MJ-127

Attorneys Mills and McDermott,

I write to provide an additional addendum to my report dated January 12, 2021, after conducting a follow-up interview with Timothy Watson by telephone on October 11, 2021.

Mr. Watson's presentation and self-report during the call was not indicative of emergence of any new psychological disorders or severe exacerbation of his prior symptoms (which included problems with executive functioning, impulsivity, depressed mood, and substance use). He indicated that the circumstances in the jail were stressful, but he stated that he was coping as best he could and indicated that he has continued to meet with the jail psychiatrist and to take his antidepressant medication. He indicated that he was sleeping during the day and reading at night, essentially to limit his exposure to other individuals in the jail, and although I typically would recommend against this type of sleep schedule (due to the effects on circadian rhythms and downstream mood effects), Mr. Watson did not describe mood-related ill effects thus far.

Mr. Watson reaffirmed his prior statements regarding his views on violence, stating that his fundamental personal belief was that people have the right to live their lives without other's intruding on their rights. He stated that violence was "the ultimate violation" of an individual's right to make their own choices. Mr. Watson characterized his past statements and online posts

P.O. Box 3867, Merrifield, VA 22116-3867

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SCANNED

received via email 10/11/2021
cc: client's parents' office 10-12-2021

*United States of America, v. Timothy J. Watson,
Controlling Psychological Technology and Education Through Algorithms
Exhibit 11, 2021
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as immature and foolish efforts at humor. I queried his possession of the books detailed by the government's materials, which included Guerrilla Warfare by Che Guevara, and the Improvised Munitions Handbook. Mr. Watson stated that he downloaded a reading application called Scribd, and the application provided recommendations based on the reader's activity. Mr. Watson stated that he initially downloaded books about self-sufficiency, and then downloaded other texts based on recommendations from the application.¹ He also stated that several of the texts on his tablet were downloaded but unread.

There is no psychological tool or technique that can tell us, definitively, if Mr. Watson's account of his changed perspective is accurate. However, in my experience not all individuals in his position (facing charges related to their far right radical views and conduct) disavow their political beliefs even when it would be in their best interest as a defendant. Also, Mr. Watson has also been consistent in his account of his beliefs regarding violence and individual rights since I began meeting with him in December of 2020.

I continue to endorse the recommendations provided in my earlier report. Mr. Watson indicated that he remains agreeable to participating in both psychotherapy and medication management. I did not identify information that would modify my opinion with regard to those recommendations, including the recommendation that the adults who will be living with Mr. Watson be made aware of the risk indicators (e.g., making threats, negatively ruminating about grudges against specific people, agitation, decreased need for sleep, irritability) that should warrant notifying his treating therapist and possibly his supervising probation officer.

Please contact me if you have further questions or concerns.

¹ I have not encountered this issue with the Scribd application specifically, but several online media companies have been criticized for linking young and impressionable individuals with radical content based on algorithms. See, for a discussion of this criticism, a June 8, 2019 New York Times article at <https://www.nytimes.com/interactive/2019/06/08/technology/youtube-radical.html>.

*United States of America, County of San Diego
Criminal Justice Training Academy
October 11, 2021
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Boyd', with a long horizontal flourish extending to the right.

Sara E. Boyd, Ph.D., ABPP
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Board Certified Forensic Psychologist
American Board of Professional Psychology